

COMMONWEALTH OF MASSACHUSETTS
Department of Telecommunications and Energy

RESPONSE OF THE ATTORNEY GENERAL TO THE
SECOND SET OF INFORMATION REQUESTS FROM THE
BAY STATE GAS COMPANY
DTE 05-27

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-29 Please refer to the Cavallo Testimony at 11, line 9. Is the coating a “film?” Describe the thickness of the coatings used to protect steel pipes and describe in detail how the thickness of those coatings have changed since they were first introduced. Describe the materials used for coating natural gas distribution mains, if the materials used have changed since coated steel was first introduced, and how such coating was and is applied to the mains and services, describing the changes in any such techniques (if any).

Response: The term “a nonconductive barrier coating film,” as used on page 11, line 9 of Mr. Cavallo’s prefiled testimony refers to: 1) nonconductive: does not readily conduct electricity; 2) barrier: a material exhibiting a low permeability (moisture transfer); 3) coating film: a layer of material applied to a substrate to mitigate corrosion. Since the Company did not provide the detailed information in response to AG -2-30 (requesting names of mains and services manufacturer to be replaced) and AG-2-31 (describe the technical specification of the mains and services listed in AG-2-30) regarding the coatings in its distribution system, there was no basis for Mr. Cavallo to conduct the requested historical review. The information requested in the second half of BSG-AG-2-29, although historically interesting in part, is not germane to the opinions expressed by Mr. Cavallo in this matter.

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